

Exhibit 1

From: [Dichter, Anna L. \(CIV\)](#)
To: [Emi MacLean](#); [Weiland, William H. \(CIV\)](#); [Saylor, Amanda B \(CIV\)](#); [Ross, Catherine \(CIV\)](#)
Cc: [Ahilan Arulanantham](#); [Jessica Bansal Contact](#); [Minju Cho](#); [Eva Bitran](#); [Erik Crew](#)
Subject: RE: NTPSA I & II - expedited production of administrative records
Date: Thursday, July 10, 2025 1:00:30 PM
Attachments: [image001.png](#)

Emi,

Defendants cannot agree to your proposal. The CARs at issue here are not for vacatur and will likely be larger. Also, the Venezuela CARs had a lot of overlap, these will not. If Plaintiffs cannot compromise further, Plaintiffs can seek expedited production with the Court.

Anna

From: Emi MacLean <EMacLean@aclunc.org>
Sent: Thursday, July 10, 2025 10:42 AM
To: Dichter, Anna L. (CIV) <Anna.L.Dichter@usdoj.gov>; Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>; Saylor, Amanda B (CIV) <Amanda.B.Saylor@usdoj.gov>; Ross, Catherine (CIV) <Catherine.Ross@usdoj.gov>
Cc: Ahilan Arulanantham <arulanantham@law.ucla.edu>; Jessica Bansal Contact <jessica@ndlon.org>; Minju Cho <mcho@aclunc.org>; Eva Bitran <EBitran@aclusocal.org>; Erik Crew <ecrew@haitianbridge.org>
Subject: [EXTERNAL] Re: NTPSA I & II - expedited production of administrative records

Thank you, Anna.

Emi MacLean
Senior Staff Attorney
ACLU of Northern California

From: Dichter, Anna L. (CIV) <Anna.L.Dichter@usdoj.gov>
Sent: Thursday, July 10, 2025 7:41:37 AM
To: Emi MacLean <EMacLean@aclunc.org>; Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>; Saylor, Amanda B (CIV) <Amanda.B.Saylor@usdoj.gov>; Ross, Catherine (CIV) <Catherine.Ross@usdoj.gov>
Cc: Ahilan Arulanantham <arulanantham@law.ucla.edu>; Jessica Bansal Contact <jessica@ndlon.org>; Minju Cho <mcho@aclunc.org>; Eva Bitran <EBitran@aclusocal.org>; Erik Crew <ecrew@haitianbridge.org>
Subject: RE: NTPSA I & II - expedited production of administrative records

Emi,

I will pass this along to the agency.

Anna

From: Emi MacLean <EMacLean@aclunc.org>
Sent: Thursday, July 10, 2025 10:38 AM
To: Dichter, Anna L. (CIV) <Anna.L.Dichter@usdoj.gov>; Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>; Saylor, Amanda B (CIV) <Amanda.B.Saylor@usdoj.gov>; Ross, Catherine (CIV) <Catherine.Ross@usdoj.gov>
Cc: Ahilan Arulanantham <arulanantham@law.ucla.edu>; Jessica Bansal Contact <jessica@ndlon.org>; Minju Cho <mcho@aclunc.org>; Eva Bitran <EBitran@aclusocal.org>; Erik Crew <ecrew@haitianbridge.org>
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Anna,

To the extent Defendants are willing to extend the effective date of the termination, we are open to a more extended period of production. As you know, for all of the terminations at issue, Defendants are providing only a 60 day winddown period for people who have lived legally in the United States for 10-26 years. In light of this, we are unfortunately not in a position to wait weeks for the CARs where our clients' lives hang in the balance and the CARs are essential for our ability to seek relief.

Moreover, Defendants' position that it will take six times as long to compile these four CARs as it took to compile the two Venezuela CARs is not defensible. Each of the CARs in *NTPSA I* consisted of fifty or fewer documents. Unless you have reason to believe that the CARs in these cases will be significantly larger, we see no reason why Defendants cannot prepare two CARs in a week, just as you did for the Venezuela CARs. Certainly the inclusion of the final USCIS Decision Memoranda and Clearance Records from the outset does not add extensive burden.

The only counteroffer we are able to consider, in light of the urgency and the experience in *NTPSA I*, is the one we offered previously--the production of the CARs for Nepal and Nicaragua within 7 days, and Honduras and Haiti within 14 days. Regardless of whether we can reach resolution without court intervention, or whether we need to go to the Court for an order for expedited production, we expect that Defendants will begin preparing the CARs in the meantime.

Emi

Emi MacLean

Pronouns: she/her/hers

Senior Staff Attorney

ACLU Foundation of Northern California

39 Drumm St., San Francisco, CA 94111



(929)375-1575 | emaclean@aclunc.org

From: Dichter, Anna L. (CIV) <Anna.L.Dichter@usdoj.gov>
Sent: Wednesday, July 9, 2025 12:13 PM
To: Emi MacLean <EMacLean@aclunc.org>; Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>; Saylor, Amanda B (CIV) <Amanda.B.Saylor@usdoj.gov>; Ross, Catherine (CIV) <Catherine.Ross@usdoj.gov>
Cc: Ahilan Arulanantham <arulanantham@law.ucla.edu>; Jessica Bansal Contact <jessica@ndlon.org>; Minju Cho <mcho@aclunc.org>; Eva Bitran <EBitran@aclusocal.org>; Erik Crew <ecrew@haitianbridge.org>
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Emi,

Compiling and producing each CAR requires a lot of communication, coordination, and review. The standard timeline for compiling one CAR is 6 weeks. That said, Defendants can agree to produce all of the CARs together in 6 weeks. Alternatively, Defendants can produce one CAR every 2 weeks, in whichever order Plaintiffs prefer. For example, Nepal 7/23, Nicaragua 8/6, etc.

Please let us know if Plaintiffs are amenable to either of these schedules.

Anna

From: Emi MacLean <EMacLean@aclunc.org>
Sent: Wednesday, July 9, 2025 2:23 PM
To: Dichter, Anna L. (CIV) <Anna.L.Dichter@usdoj.gov>; Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>; Saylor, Amanda B (CIV) <Amanda.B.Saylor@usdoj.gov>; Ross, Catherine (CIV) <Catherine.Ross@usdoj.gov>
Cc: Ahilan Arulanantham <arulanantham@law.ucla.edu>; Jessica Bansal Contact <jessica@ndlon.org>; Minju Cho <mcho@aclunc.org>; Eva Bitran <EBitran@aclusocal.org>; Erik Crew <ecrew@haitianbridge.org>
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Thank you, Anna. Plaintiffs would be amenable to the production of the CARs for Nepal and Nicaragua within 7 days, and Honduras and Haiti within 14 days. This is consistent with the Court's order (and Defendants' production) in *NTPSA I*, where Defendants were ordered to, and did, produce the CAR for two decisions within seven days.

Further, based on the records that have been produced in *NTPSA I*, it is Plaintiffs' position that the final USCIS Decision Memo and Clearance Records are included within the CAR. Please confirm that Defendants will include the Decision Memo and Clearance Records in these CARs.

Best,
Emi



Emi MacLean
Pronouns: she/her/hers
Senior Staff Attorney
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From: Dichter, Anna L. (CIV) <Anna.L.Dichter@usdoj.gov>
Sent: Wednesday, July 9, 2025 9:27 AM
To: Emi MacLean <EMacLean@aclunc.org>; Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>; Saylor, Amanda B (CIV) <Amanda.B.Saylor@usdoj.gov>; Ross, Catherine (CIV) <Catherine.Ross@usdoj.gov>
Cc: Ahilan Arulanantham <arulanantham@law.ucla.edu>; Jessica Bansal Contact <jessica@ndlon.org>; Minju Cho <mcho@aclunc.org>; Eva Bitran <EBitran@aclusocal.org>; Erik Crew <ecrew@haitianbridge.org>
Subject: RE: NTPSA I & II - expedited production of administrative records

Hi Emi,

7 days for three administrative records is not achievable. Can you propose a different schedule?

Best,

Anna

From: Emi MacLean <EMacLean@aclunc.org>
Sent: Tuesday, July 8, 2025 7:17 PM
To: Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>; Dichter, Anna L. (CIV) <Anna.L.Dichter@usdoj.gov>; Saylor, Amanda B (CIV) <Amanda.B.Saylor@usdoj.gov>; Ross, Catherine (CIV) <Catherine.Ross@usdoj.gov>
Cc: Ahilan Arulanantham <arulanantham@law.ucla.edu>; Jessica Bansal Contact <jessica@ndlon.org>; Minju Cho <mcho@aclunc.org>; Eva Bitran <EBitran@aclusocal.org>; Erik

Crew <ecrew@haitianbridge.org>

Subject: [EXTERNAL] NTPSA I & II - expedited production of administrative records

Counsel,

Plaintiffs seek expedited production of the administrative record for Defendants' decisions terminating TPS for Haiti, Nepal, Honduras and Nicaragua. In light of the urgent timeline for the challenges to these decisions, and the limited records at issue, Plaintiffs ask that Defendants produce these CARs within 7 days, which is the same length of time Judge Chen ordered for production of the Venezuela CARs and the Haiti vacatur CAR in NTPSA I.

Please confirm that Defendants will begin assembling those CARs immediately and please let us know if you will voluntarily produce them within 7 days or if we will need to seek the Court's intervention.

Best,

Emi

Emi MacLean

Senior Staff Attorney

ACLU of Northern California